

Exhibit B

Thursday, June 15, 2017

** DO NOT DISCLOSE **

** SUBJECT TO FURTHER CONFIDENTIALITY REVIEW **

17 Videotaped deposition of BRANDON KANG, M.D.,
held at Mahaffey, Pickens & Tucker, 1550 North
18 Brown Road, Suite 125, Lawrenceville, Georgia,
commencing at 10:09 a.m., on the above date,
19 before Susan D. Wasilewski, Registered
Professional Reporter, Certified Realtime
20 Reporter, Certified Realtime Captioner, Certified
Manager of Reporting Services, Florida
21 Professional Reporter, Certified Court Reporter
(NJ), and Realtime Systems Administrator

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1 A. I do not.

2 Q. And you don't know anything about the
3 credentials or the experience of the physician who
4 implanted Ms. Booker's filter, do you?

5 A. I do not.

6 Q. You don't know if he was a vascular surgeon
7 or an interventional radiologist, do you?

8 A. I don't know.

9 Q. So as you sit here today, you cannot provide
10 opinions or testimony in any way relating to the
11 implant of that filter; is that right?

12 A. Well, that's not completely correct. I have
13 plenty of experience implanting that type of filter
14 and retrieving that filter, so --

15 Q. But you have no experience implanting the
16 filter in Ms. Booker; is that right?

17 A. In her, no, but that filter, yes.

18 Q. Okay. But again, you don't know what the
19 doctor who implanted the filter knew or what his
20 decision process was, do you?

21 A. Correct.

22 Q. Okay. And you don't intend to offer any
23 opinions relating to that, do you?

24 A. I mean, I can't make an opinion for him, no.

25 Q. You agree with me that IVC filters can save

1 lives, don't you?

2 A. That's a correct statement. I agree.

3 Q. In fact, you have made that statement
4 publicly, haven't you?

5 A. I have.

6 Q. I'm going a little bit out of order but I'm
7 going to show you what I've marked -- I'm going to
8 mark as Exhibit 11 to your deposition, and I'm going
9 to go ahead and mark 12 at the same time so that I
10 have it together.

11 (Kang Exhibit 11 was marked for
12 identification.)

13 (Kang Exhibit 12 was marked for
14 identification.)

15 MR. ROLL: Do you have copies?

16 MS. HELM: I do. Just give me a second.

17 I've just got to get them --

18 MR. ROLL: That's 11?

19 MS. HELM: No, that's 12. I did them
20 backwards. Sorry. 11 is the --

21 BY MS. HELM:

22 Q. Dr. Kang, I want you to look at Exhibits 11
23 and 12 and let's start -- --

24 A. Okay.

25 Q. -- with Exhibit 12. Is Exhibit 12 a screen